

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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In re	: Chapter 9
	:
CITY OF DETROIT, MICHIGAN,	: Case No. 13-53846
	:
Debtor.	: Hon. Steven W. Rhodes
	:
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**CITY OF DETROIT’S  
COUNTER-DESIGNATION OF THE CONTENTS OF THE RECORD**

Pursuant to Rule 8006 of the Federal Rules of Bankruptcy Procedure, appellee the City of Detroit (the “City”) hereby submits this counter-designation of the contents of the record in response to *Appellants’ Designation Of Items To Be Included In The Record On Appeal And Statement Of Issue To Be Presented On Appeal* [4745] filed by Appellants Dexia Credit Local, Dexia Holdings, Inc., Erste Europäiische Pfandbrief- und Kommunalkreditbank Aktiengesellschaft in Luxemburg S.A., FMS Wertmanagement AöR, Hypothekbank Frankfurt AG, and Hypothekbank Frankfurt International S.A., (collectively, the “COPs”), on May 13, 2014.

## Designation of Additional Items to Be Included in the Record On Appeal

### A. Case No. 13-53846

Item No. (Attached)	Docket No.	Description
1.	692	(Excerpt) Transcript Regarding Hearing Held August 28, 2013
2.	2029	Omnibus Reply of the City of Detroit to Objections to the Motion for Assumption and Approval of the Forbearance and Optional Termination Agreement
3.	2033	Statement of Merrill Lynch Capital Services, Inc. and UBS AG in Support of Debtor's Motion for an Order Pursuant to Section 365(a) of the Bankruptcy Code and Rule 9019, and in Reply to the Objections to the Motion (and the exhibits/appendices attached thereto)
4.	2061	Statement of Stipulated Facts Regarding Motion of Debtor for Entry of an Order (I) Authorizing the Assumption of That Certain Forbearance and Optional Termination Agreement Pursuant to Section 365(a) of the Bankruptcy Code, (II) Approving Such Agreement Pursuant to Rule 9019, and (III) Granting Related Relief
5.	2364	Second Amended Exhibit List and Objections for Hearing re City of Detroit's Assumption Motion and Motion to Approve Post-Petition Financing
6.	2947	The City of Detroit's Disclosure of Witnesses in Connection With the Hearing on the City's Motion for Order Approving Settlement and Plan Support Agreement

7.	2955	Transcript Regarding Hearing Held March 5, 2014
8.	3061	Certificate of Service of Deborah Kovsky-Apap re: Corrected Motion of Debtor for Entry of an Order, Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rule 9019, Approving a Settlement and Plan Support Agreement and Granting Related Relief
9.	3606	Order Denying Motion to Adjourn Hearing
10.	3817	Corrected Transcript Regarding Hearing Held April 2, 2014
11.	4057	Transcript Regarding Hearing Held April 11, 2014 re: Bench Opinion re. (2806) Corrected Motion to Approve Compromise/Motion of Debtor for Entry of an Order, Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rule 9019, Approving a Settlement and Plan Support Agreement and Granting Related Relief
12.	Proof of Claim # 1352	Syncora Guarantee, Inc.
13.	Proof of Claim # 1354	Syncora Capital Assurance, Inc.

**B. City's Exhibits**

14.	City Ex. 1	ISDA Master Agreement between UBS AG and Detroit General Retirement System ("GRS") Service Corporation (Local Currency Single Jurisdiction), and related Schedule
15.	City Ex. 2	ISDA Master Agreement between SBS Financial Products Company, LLC ("SBS") and GRS Service Corporation (Local Currency Single Jurisdiction), and related Schedule
16.	City Ex. 4	SBS and GRS Service Corporation Amended and Restated Schedules to 1992 ISDA Master Agreement Local Currency Single Jurisdiction dated as of June 7, 2006
17.	City Ex. 5	UBS AG and GRS Service Corporation Amended and Restated Schedule to the 1992 ISDA Master Agreement Local Currency Single Jurisdiction dated as of June 7, 2006
18.	City Ex. 6	Syncora Waiver and Consent, dated June 26, 2009
19.	City Ex. 47	UBS AG Insurance Policies for Scheduled Payments of GRS Service Corporation under June 7, 2006 Master Agreement
20.	City Ex. 48	SBS Insurance Policies for Scheduled Payment of GRS Service Corporation under June 7, 2006 Master Agreement
21.	City Ex. 49	Moody's and Standard & Poor's Ratings of Syncora obtained from Syncora's website ( <a href="http://syncora.com/?page_id=78">http://syncora.com/?page_id=78</a> )
22.	City Ex. 123	City Ordinance No. 05-09

23.	City Ex. 143	Illustrative Cash Chart
24.	City Ex. 144	City of Detroit – Illustrative Cash Flow Forecast Scenarios
25.	City Ex. 146	In re City of Detroit, Michigan (Case No. 13-53846), Privilege Log of Selected Documents

Dated: May 27, 2014

Respectfully submitted,

/s/ Deborah Kovsky-Apap  
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ATTORNEYS FOR THE CITY OF DETROIT

### **CERTIFICATE OF SERVICE**

I hereby certify that on May 27, 2014, I caused the foregoing City of Detroit's Counter-Designation of The Contents of The Record to be electronically filed with the Clerk of the Court which sends notice by operation of the Court's electronic filing service to all ECF participants registered to receive notice in this bankruptcy case.

Dated: May 27, 2014

/s/ Deborah Kovsky-Apap  
Deborah Kovsky-Apap (P68258)